tribes and yet "have never pursued off-reservation land acquisitions in the Twin Cities in spite of

their right to do so."[86] In addition, in their view, the intent of IGRA was to promote "on-

reservation economic development." Anderson's memo asserted that the Hudson application

was the "bail-out of a failed non-Indian dog-track," a phrase coined by the tribe's Washington

lobbyists and repeated throughout the course of this matter.[87]

Manuel assured the Mille Lacs representatives that the Secretary must consult with the

Mille Lacs. Manuel also reportedly advised the Mille Lacs Chairwoman that opponents to

another then-pending off-reservation gaming application (that of the Sault Ste. Marie tribe) had

argued against allowing the applicant tribe in that case to develop a casino on property that was

not "historically tribal lands." Anderson also reported that Manuel said there is a MAO

precedent that mandates consultation with all tribes within in a 350-mile radius of the proposed

project.[88] Manuel encouraged any tribes opposing the application to respond in writing to DOI's

request for input. The memo suggests that Manuel heartened the Mille Lacs by noting that, to

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[86]Memorandum from Marge Anderson to Member Tribes, MIGA, undated.

[87]Babbitt himself adapted a variation of this slogan during his testimony before the House Committee, deriding "the gambling interests financing this application" for "their interest in bailing out their failing dog track." *The Department of the Interior's Denial of the Wisconsin Chippewa's Casino Applications, Vol. 1: Hearings Before the Comm. on Government Reform and Oversight*, 105th Cong., 2nd Sess. 578 (1998) (testimony of Bruce Babbitt) (hereinafter "Babbitt House Test.").

[88]Memorandum from Marge Anderson to Member Tribes, MIGA, undated. Manuel did not recall the meeting but added it would be common for her to meet with tribal leaders if asked. How accurately Anderson recorded Manuel's statements is uncertain. The decision had been made to consult with all tribes in Minnesota and Wisconsin, but not apparently by setting any mileage radius.